

MICHAEL JAY BERGER (State Bar # 100291)
LAW OFFICES OF MICHAEL JAY BERGER
9454 Wilshire Blvd. 6th Floor
Beverly Hills, CA 90212-2929
Telephone: (310) 271-6223
Facsimile: (310) 271-9805
E-mail: Michael.Berger@bankruptcypower.com

Proposed Counsel for Debtor and Debtor-in-Possession,
Mr. Tortilla, Inc.

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SAN FERNANDO VALLEY DIVISION

In re:) CASE NO.: 1:24-bk-10228-VK

)
Mr. Tortilla, Inc.,) Chapter 11

)
Debtor and Debtor-in-Possession.) **NOTICE OF HEARING ON DEBTOR'S**
) **MOTION FOR AN ORDER**
) **AUTHORIZING DEBTOR TO SATISFY**
) **PRE-PETITION CLAIMS OF CRITICAL**
) **VENDOR AMAZON.COM SERVICES,**
) **LLC NECESSARY FOR DEBTOR'S**
) **CONTINUED BUSINESS OPERATION**

)
)
) Date March 7, 2024

) Time: 1:30 p.m.

) Ctrm: 301 [via ZoomGov and in-person]

) Place: 21041 Burbank Blvd., 3rd Floor
) Woodland Hills, CA 91367

)
) *[Served Concurrently with the Critical Vendor*
) *Motion and Order Granting Application on*
) *Shortened Notice]*

1 **TO THE HONORABLE VICTORIA S. KAUFMAN, JUDGE OF THE UNITED**
2 **STATES BANKRUPTCY COURT, TO THE OFFICE OF THE UNITED STATES**
3 **TRUSTEE, TO SECURED CREDITORS, 20 LARGEST UNSECURED CREDITORS,**
4 **AND TO ALL INTERESTED PARTIES AND THEIR COUNSEL OF RECORD:**
5

6 **PLEASE TAKE NOTICE** that the hearing on Debtor's Motion for an Order
7 Authorizing Debtor to Satisfy Pre-Petition Claims of Critical Vendor Amazon.Com Services,
8 LLC Necessary for Debtor's Continued Business Operation will take place on **March 7, 2024 at**
9 **1:30 p.m.** in Courtroom 301 of the above-referenced Courthouse located at 21041 Burbank
10 Blvd., 3rd Fl., Woodland Hills, California 91367.

11 **PLEASE TAKE FURTHER NOTICE** that any oppositions and replies may be made
12 orally at the hearing.

13 **PLEASE TAKE FURTHER NOTICE** that the hearing will be held simultaneously in
14 person in Courtroom 301 and remotely via ZoomGov:

15
16 **Join CACB ZoomGov**

17 Meeting Video/audio web address: <https://cacb.zoomgov.com/j/1608055403>

18 Meeting ID: 160 805 5403

19 Password: 464345

20 **Join by Telephone**

21 Telephone conference lines: 1-669-254-5252 OR 1-646-828-7666

22 Meeting ID: 160 805 5403

23 Password: 464345

24 **LAW OFFICES OF MICHAEL JAY BERGER**

25 Dated: 3/5/2024

By: /s/Michael Jay Berger

26 Michael Jay Berger

27 *Proposed* Counsel for Debtor and Debtor-in-Possession,
28 Mr. Tortilla, Inc.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
9454 Wilshire Blvd., 6th Fl., Beverly Hills, CA 90212

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF HEARING ON DEBTOR'S MOTION FOR AN ORDER AUTHORIZING DEBTOR TO SATISFY PRE-PETITION CLAIMS OF CRITICAL VENDOR AMAZON.COM SERVICES, LLC NECESSARY FOR DEBTOR'S CONTINUED BUSINESS OPERATION** will be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 3/5/2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:
Proposed Counsel: Michael Jay Berger michael.berger@bankruptcypower.com,
yathida.nipha@bankruptcypower.com;michael.berger@ecf.inforuptcy.com
U.S. Trustee: Katherine Bunker kate.bunker@usdoj.gov
Counsel for 8fig Inc.: John E Johnson jjohnson@padfieldstout.com
Interested Party: Matthew D. Resnik Matt@rhmfir.com,
roksana@rhmfir.com;rosario@rhmfir.com;sloan@rhmfir.com;priscilla@rhmfir.com;rebeca@rhmfir.com;david@rhmfir.com;susie@rhmfir.com;max@rhmfir.com;russ@rhmfir.com
Counsel for Amazon.com: Brandy A Sargent brandy.sargent@klgates.com,
litigation.docketing@klgates.com;janna.leasy@klgates.com
United States Trustee (SV) ustpreion16.wh.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on 3/5/2024, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Honorable Victoria Kaufman
United States Bankruptcy Court
Central District of California
21041 Burbank Boulevard, Suite 354 / Courtroom 301
Woodland Hills, CA 91367 United States Bankruptcy Court

☒ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

3/5/2024
Date

Peter Garza
Printed Name

/s/Peter Garza
Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

3. Served by Email:

U.S. Trustee:

Katherine Bunker

kate.bunker@usdoj.gov; julie.morales@usdoj.gov

SECURED CREDITORS:

8FIG Advance

Attn: Legal Dept.

legal@8fig.com; jjohnson@padfieldstout.com

Amazon Capital Services:

Attn: Lauren Dorsett & Michael Gearin

laurendorsett@dwt.com

mike.gearin@klgates.com ; brandy.sargent@klgates.com; litigation.docketing@klgates.com; janna.leasy@klgates.com

Blue Bridge Financial

Attn: Amy Joy

ajoy@bluebridgefinancial.com

Legal@bluebridgefinancial.com

Bluevine

Attn: Officer

Support@bluevine.com

Cedar Advance

Attn: Simon Cedar

simon@cedaradvance.com

Corporation Service Company

SPRFiling@cscglobal.com; UCCSPREP@cscglobal.com

CT Corporation

uccfilingreturn@wolterskluwer.com

Fasanara Securitisation S.A. Acting

info@northdata.com

Financial Pacific Leasing

Attn: Allison Sweet

ASweet@FinPac.com

First Corporate Resolution

SPRS@FICOSO.COM

Huntington Valley Bank

Attn: Erin

erin@braavobank.com

Mercury Capital
info@mcadv.com

Metropolitan Capital Bank & Trust
Attn: Jeffrey Brown
rrabin@thompsoncoburn.com ; jbrown@thompsoncoburn.com

Parkside Funding Group LLC
Attn: Adriana Harris
Adriana@nomasrecovery.com

Partners Personnel Management Services, LLC
Attn: Cherly Canty
CCanty@espererholdings.com

Robert Reiser and Company
uccfilingreturn@wolterskluwer.com

Sand Park Capital
Attn: Simon Cedar
simon@cedaradvance.com

Sellers Funding
Attn: Officer
osaro@sellersfi.com; legal@sellersfi.com

Shopify Capital
Legal@bluebridgefinancial.com

Slope Advance
Attn: Ashish Jain
ashish@slope.com

Spartan Capital
Attn: Jason Gang
jason@jasongang.com

Stor RB One Limited
uccfilingreturn@wolterskluwer.com

U.S. Business Administration
Attn: Elan Levey
elan.levey@usdoj.gov

20 LARGEST UNSECURED CREDITORS

Easy Post
Attn: Dustin Henrie
dhenrie@easypost.com

Facebook

Attn: Anthony Miller
Anthony.Miller@radiusgs.com

Fleetcor Technologies Inc.
Attn: Officer
PartnerServices@FleetCor.com; jowilliams@williamsandwilliams.com

Greenberg Traurig
Attn: Reid Hockaday
hockadayr@gtlaw.com

IRS
Attn: Officer
Irs.gov.website.helpdesk@speedymail.com; Dorletha.M.Godley@irs.gov

Lyneer Staffing
Attn: Billing Dept.
billing@lyneer.com

Parker Group Inc.
Attn: Larry Nessenson, Esq.
lnessenson@jaffeandasher.com

Ramp
Attn: Officer
communications@ramp.com; support@ramp.com

Jeeves
alexg@tryjeeves.com; lucio@tryjeeves.com

Southern California Edison
Anthony Tarantino
Anthony.Tarantino@sce.com

UPS
Attn: Mary Kay
MaryKay.Pallas@iqor.com

We Pack it All
jesse.fonseca@wepackitall.com

Rapid Fulfillment LLC
Attn: Adam Brumage
ABrumage@collectmoore.com

Frisbi
billing@frisbi.com

Taboola
Attn: Fred Sampliner
fsampliner@sampliner.com nminassian@hatkofflaw.com

MNTN
legal@mountain.com

Perpetua
billing@perpetua.io

Uline
accounts.receivable@uline.com

Bakers Authority
yoni@bakersauthority.com

Attentive Mobile
GMCCREADIE@nixonpeabody.com

SoCal Gas
customerservice@socalgas.com

Republic Services
ccet@republicservices.com

ADDITIONAL CREDITORS:

ArcBest, Inc.
dlott@arcb.com

Old Dominion Freight Line, Inc.
Attn: Rusty Frazier
Rusty.frazier@odfl.com

TikTok Inc.
Attn: Emely Andino
usbilling@bytedance.com
Pawnee Leasing Corp.
Bankruptcy@pawneeleasing.com

KTLA/KTLA
c/o The Law Offices of Gary A Bemis
LegalService@bemislawoffices.com